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A Professional Limited Liability Company

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Philip R. Adams, Jr.

February 26, 2009

Via ECFS

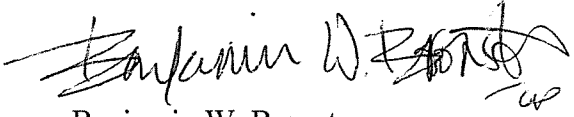
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36.

Dear Ms. Dortch:

Please find attached the Annual Customer Proprietary Network Information ("CPNI") Compliance Certification for Telemanagement Services, Inc. Please feel free to call me if you have any questions regarding this filing.

Sincerely,



Benjamin W. Bronston

BWB/cdp

Attachment

Customer Proprietary Network Information Certification Accompanying Statement

Telemanagement Services, Inc. ("TSI") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 — 64.2011 of the Commission's rules. This attachment summarizes TSI's practices and procedures, which have been updated to adequately ensure compliance with the Commission's CPNI rules.

Safeguarding against pretexting

- TSI takes reasonable measures to protect CPNI and believes that these measures sufficiently prevent unauthorized access to CPNI.

Training and discipline

- TSI has trained its personnel in the appropriate use of CPNI. All employees with access to CPNI are required to review and comply with TSI's CPNI policies and procedures.
- TSI has disciplinary process in place for violations of TSI's CPNI policies and procedures which would encompass any misuse of CPNI.

TSI'S use of CPNI

- TSI does not share, disclose, or otherwise provide CPNI to third parties.
- TSI may use CPNI for the following purposes:
 - > To initiate, render, maintain, repair, bill and collect for services;
 - > To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - > To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent; and
 - > To market additional services to customers that are within the same categories of service to which the customer already subscribes.
- TSI does not disclose or permit access to CPNI to track customers that call competing service providers.
- TSI discloses and permits access to CPNI where required by law (e.g., under a lawfully issued subpoena).

Customer approval and informed consent

- TSI does not use CPNI for any purpose that would require customer approval to do so. TSI does not use CPNI for any marketing purposes and does not share, disclose, or otherwise provide CPNI to any third party. If this policy changes in the future, TSI will implement practices and procedures to ensure compliance with the Commission's CPNI regulations.

Additional safeguards

- TSI has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- TSI designates one or more officers, as an agent or agents of the company, to sign and file a CPNI Compliance Certificate on an annual basis. The Certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- TSI properly authenticates a customer prior to disclosing CPNI based on customer initiated telephone contact, online account access, or an in-person visit.
- TSI notifies customers immediately of any account changes.
- TSI may negotiate alternative authentication procedures for services that TSI provides to business customers that have both a dedicated account representative and a contract that specifically addresses TSI's protection of CPNI.
- In the event of a breach of CPNI, TSI will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs TSI to delay notification, or TSI and the investigatory party agree to an earlier notification. TSI will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 27, 2009

Name of Company Covered by this Certification: Telemanagement Services, Inc.

Form 499 Filer ID: 820137

Name of Signatory: Deborah L. Ward


Title of Signatory: President

I am the President of Telemanagement Services, Inc. and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Telemanagement Services, Inc. I have personal knowledge that Telemanagement Services, Inc. has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 *et. seq.*

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Telemanagement Services, Inc. received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Telemanagement Services, Inc. has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2008. Telemanagement Services, Inc. will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Telemanagement Services, Inc. is taking to protect CPNI.

This Certification is dated this 12th day of February, 2009.



Deborah L. Ward

President

Telemanagement Services, Inc.